

In the Matter Of:

ROBERT A. FLAUGHER

vs.

CABELL HUNTINGTON HOSPITAL, INC., ET AL

ANGELA BIANCO, M.D.

February 11, 2015

MERRILL LAD

1325 G Street NW, Suite 200, Washington, DC
Phone: 800.292.4789 Fax: 202.861.3425

**PLAINTIFF'S
EXHIBIT**

12

ANGELA BIANCO, M.D. - 2/11/2015

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA AT HUNTINGTON

-----X

ROBERT A. FLAUGHER, as Administrator of
the Estate of Shahnaz Rumman;

Plaintiff,

-against- Case No. 3:13-cv-28460

CABELL HUNTINGTON HOSPITAL, INC., et al.,

Defendants.

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Mount Sinai Medical Center
Klingenstein Pavillion
1176 Fifth Avenue
New York, New York

February 11, 2015

4:18 P.M.

VIDEOTAPED DEPOSITION of ANGELA BIANCO, M.D., an
Expert Witness herein, taken by Plaintiff, pursuant to Notice.

Job No,. WDC-024979

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1	Dr. Rumman had came to the hospital 24 hours	18:06:39
2	before that, she would have survived?	18:06:42
3	A It's -- I think that she would have	18:06:46
4	increased her chances of survivability, yes.	18:06:48
5	Q By how much?	18:06:51
6	A I can't put a number on that.	18:06:53
7	Q And in order to put the blame on Dr. Rumman	18:06:54
8	for not coming to the hospital earlier,	18:07:03
9	what --	18:07:07
10	A If I can just interject, I wouldn't say	18:07:07
11	that I am blaming her for not coming to the	18:07:09
12	hospital earlier.	18:07:12
13	Q Okay.	18:07:13
14	A People have a variety of reasons for not	18:07:14
15	reporting signs and symptoms.	18:07:16
16	Q Right.	18:07:18
17	And a doctor would have to be able to	18:07:20
18	recognize the importance of the leaking fluid,	18:07:22
19	have to know how much fluid leaked, whether	18:07:27
20	there was infection there, an infection not	18:07:29
21	there, correct?	18:07:31
22	A No. You can't ascertain as a patient	18:07:32
23	whether or not there is an infection	18:07:35
24	present --	18:07:37
25	Q Right, okay.	18:07:37